

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JAMEL S. DUMAS,	:	NO. 1:09-cv-2235
Plaintiff,	:	
	:	(Magistrate Judge Martin Carlson)
v.	:	
	:	
PATRICK McKINNEY, et al.,	:	
Defendants.	:	ELECTRONICALLY FILED

DEFENDANT'S PROPOSED JURY VOIR DIRE

Defendant Patrick McKinney, by and through his undersigned counsel,
Lamb McErlane PC, hereby submits the following proposed voir dire questions:

1. This case involves allegations against Patrolman Patrick McKinney of the City of Lebanon Police Department. Do you have any bias against the City of Lebanon or its Police Department that would affect your ability to render a fair and impartial verdict based on the facts that will be presented?

2. Have you or a family member ever brought a claim or lawsuit against, or had any negative involvement with, the City of Lebanon or any other municipality?

3. Do you have any bias against police officers that would affect your ability to render a fair and impartial verdict based on the facts that will be presented?

4. Do you believe that the testimony of a police officer should be given less weight than the testimony of other witnesses?

5. Do you know or know of Plaintiff Jamel Dumas or Defendant Ptlm. Patrick McKinney?

6. In addition to the parties in this case, there are several witnesses who may testify on behalf of one or both of the parties. The possible witnesses are:

Defendant's Possible Witnesses:

- Sgt. Steven Bord
- Patrolman Ryan Margut
- Patrolman Ryan Mong
- Patrolman Eric Sims
- Paula Logan of Lebanon, PA
- Alice M. Gingrich of Lebanon, PA

Plaintiff's Possible Witness(es):

- Robert Dumas

7. Have you, a family member, or close friend ever been the victim of a crime?

8. Has anyone you know been involved in a civil proceeding, either as a

plaintiff or a defendant? If so, would this affect your ability to fairly and impartially view the evidence presented?

9. Have you, a family member, or a close friend ever been arrested or otherwise detained by police, other than a routine traffic stop?

10. Have you ever been a witness to a crime? If so, were you asked to give a statement? If so, did you testify in Court?

11. Do you believe that every person who files a lawsuit should be entitled to some recovery?

12. If the facts and testimony presented indicate that Plaintiff's claims are unfounded, would you have any difficulty entering a verdict in favor of the Defendant?

Respectfully submitted,

Dated: February 28, 2011

/s/David J. MacMain

David J. MacMain (I.D. No. 59320)

LAMB McERLANE, PC

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Attorney for Defendant Ptln. Patrick McKinney

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of February 2011, the foregoing Defendant's Proposed Jury Voir Dire was filed electronically and is available for viewing and downloading from the ECF system. The following party received electronic service of the Notice of Electronic Case Filing:

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/s/ David J. MacMain

David J. MacMain